

RECEIVED
FEDERAL JUDICIAL SECTION
JUL 27 2016

2016 JUL 27 PM 12:01 Page 1

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, NORTHWEST DISTRICT
VAN NUYS COURTHOUSE EAST

CELA

-----x
3 TRANSNATIONAL MANAGEMENT SYSTEMS, LLC and
4 TRANSNATIONAL MANAGEMENT SYSTEMS II, LLC,

Plaintiffs, CASE NO. LC100724

vs.

7 PEGASUS ELITE AVIATION, INC.;
TIMOTHY PRERO; and TIMOTHY HANOUSEK;
8 and DOES 1 through 25,
9 Defendants.

-----x
10 PEGASUS ELITE AVIATION, INC.,
11 CROSS-COMPLAINANT

12 vs

13 TRANSNATIONAL MANAGEMENT SYSTEMS, LLC;
TRANSNATIONAL MANAGEMENT SYSTEMS II, LLC;
14 GAS ORANGE PARTNERS, LP; ADAM VICTOR;
AND ROES 1 TO 10,

15 CROSS DEFENDANTS.

16 -----x
17
18 VIDEOTAPED DEPOSITION OF TYLER ERDMAN
19 NEW YORK, NEW YORK
20 Thursday, July 14, 2016
21
22

23 Reported by:
JENNIFER DE LEON
24 Job No. 110099
25

1

3

4

Thursday, July 14, 2016

5

12:14 p.m.

6

7

8

Videotaped deposition of TYLER ERDMAN held

9

at, 250 Park Avenue, Sixth Floor, New York, New York,

10

10177, before Jennifer De Leon, Notary Public of the

11

State of New York.

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1

2 APPEARANCE S:

3

4

5

DAVIDOFF HUTCHER & CITRON

Attorneys for Plaintiffs and Cross-Defendants

6

605 Third Avenue

New York, New York 10158

7

BY: JOSHUA KRAKOWSKY, ESQ.

8

9

CLARK & TREVITHICK

Attorneys for Defendant and Cross-Complainants

10

800 Wilshire Boulevard

Los Angeles, California 90017

11

BY: DAVID OLSON, ESQ.

12

LAW OFFICES OF JOHN T. BRENNAN

13

Attorney for the Witness

151 East 4th Street

14

Brooklyn, New York 11218

BY: JOHN BRENNAN, ESQ.

15

16

17

18

19

ALSO PRESENT:

20

Eric Fischer, Videographer

21

22

23

24

25

1 THE VIDEOGRAPHER: We are now on the record.
This begins -- this is the start of DVD No. 1 in the
deposition of Tyler Erdman in the matter of Transnational
4 Management Systems, LLC, the Pegasus Elite Aviation, Inc.,
5 et al, in the Superior Court of the State of California;
6 County of Los Angeles, Northwest District,
7 Van Nuys Courthouse East; Number LC-100724.

Today is Thursday, July 14th, 2016 and
9 the video time is approximately 12:14 p.m. This deposition
10 is being taken at 250 Park Avenue, New York, New York at
11 the request of Clark & Trevithick.

12 My name is Eric Fischer and I'm the
13 legal video specialist from TSG Reporting, Inc. and the
14 court reporter is Jennifer de Leon and is also in
15 association for TSG Reporting, Inc. All appearances will
16 be noted on the stenographic record.

17 Will the court reporter, please swear in the
18 witness.

19 TYLER E R D M A N, called as a witness,
20 having been first duly sworn by a Notary
21 Public of the State of New York, was examined
22 and testified as follows:

23 THE REPORTER: May I have your full name and
24 your present address.

25 THE WITNESS: Mm-hmm.

170444424512
Tyler Ike Erdmann and 20 -- oh, E-R-D-M-A-N,
and 1, Weston, Connecticut 06883.

THE REPORTER: First two.

4 MR. BRENNAN: Mr. Olson, can you hear us?

5 MR. OLSON: Yes.

6 MR. BRENNAN: Okay. I think we're set. The
7 witness is sworn.

8 MR. OLSON: Okay. Great. Does the reporter
9 need the appearance from the counsel?

10 THE REPORTER: No, I have everything,
11 counselor.

12 MR. OLSON: All right. Great.

13 -000 -

14 EXAMINATION BY

15 MR. OLSON:

16 Q. Good morning, Mr. Erdman.

17 A. Good morning.

18 Q. Could you please state your full name for the
19 record?

20 A. Yup. Tyler Ike Erdman.

21 Q. And what is your business address?

22 A. Weston, Connecticut 06883.

23 Q. Thank you.

24 And for whom do you presently work?

25 A. I'm self-employed.

election campaign contribution laws?

A. Yes.

MR. OLSON: Okay. So why don't -- if somebody can hand Mr. Erdman Exhibits 612 and 613.

MR. BRENNAN: Got it.

Q. How many -- well, let's start with Exhibit 612 as matter under review, Number 7005; do you see that?

A. Yes, I do.

Q. Now this is a complaint that you initiated, correct?

A. Yes.

Q. And let me ask you this first: Do you know whether Mr. Victor has responded to this complaint?

A. I do not know if he has responded.

Q. Okay. Do you know if the FDC has made any determinations as to whether they're going to open a case based on your citizen complaint?

A. I haven't received any communication regarding enforcement from them.

Q. Okay. Do you know what the status of 7005 is?

A. I think it's still under review.

Q. Okay. All right. Great.

Now in the -- in the complaint, why don't we start with -- on page 4.

A. Okay.

1 Q. You make a reference to Marta Grabowska. She
2 was a former employee of Mr. Victor's who you identified
3 earlier, correct?

4 A. Yes.

5 Q. And on page 5, you have specific dates and
amounts and recipients of him paying contributions made by
7 Marta; do you see that?

8 A. Yes, I do.

9 Q. Where did you get this information from?

10 A. Mr. Victor had solicited me to make similar
11 contributions in both of those instances so I was well
12 aware of where it is and it was also mentioned in the
13 record of, I believe, Yevgeniya's sexual harassment case.

14 Q. Okay. Do you have documentation though, do
15 you have like a computer file or some supporting records
16 regarding the dates, and the personnel, and the amounts of
17 these contributions?

18 A. I believe they are referenced in an
19 affidavit filed by Andrew Costa.

20

21

22

23

24

25